OF CASE

Public Comment Form

Cascade County Public Works Department Planning Division 121 4th St N, Suite 2H-2I Great Falls, MT 59401

Phone: 406-454-6905 Fax: 406-454-6919

Instructions

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Date Received: 2-15-19	Date Reviewed:	2-15-19	Complete:	¥Yes	□ No



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Fax: 406-454-6919

Instructions

Commenter Information ,
Name: Kichard P. Stotness
Complete Address: 13 Willow Run Lane Great Falls MT 59405
Comment Subject (please check one)
\square Special Use Permit Application \square Subdivision \square Zoning Text and/or Map Amendment
\square Growth Policy \square Variance \square Floodplain Regulation Amendment
\square Subdivision Regulation Amendment \square County Road Abandonment/ Discontinuation of County Street
D'Other (describe): Proposed Zoning Changes
Comment
I bearby requet:
10 Planning board heaving be delayed to allow additional time for the public to review the changes and prepare for the heaving.
2. The hearing scheduled on Feb 19th 2019 specifically allow for 'public testimony' and be continued to March 2019 for adequate preparation of public comment on the proposed zoning changes.
3. The March and any further hearings be scheduled after 5:00 pm on weakdays to allow for full public participation
For Office Use Only
Date Received: 2-15-19 Complete: ☐ Yes ☐ No



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Instructions

Commenter Information	1.1			
Name: Dana D. Bo	ssmiller			We was the state of the state o
Complete Address: 330 Has:	tings Boad	Sand Coulee	2, MT. 594	72
Comment Subject (please check one)				
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Fax: 406-454-6919

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Commenter Information				
Name: TAMMY KANTOR	CZ Zwa			
Complete Address: 744 H工&	HWOOD RO	GREAT FALLS	MT 59405	
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Instructions

Commenter Information Name: PLAINS GRAINS	LIMITED PAR	ETNESHIP			
Name: PLAINS GRAINS Complete Address: 149 B1	CKFORD Rd,	GREAT FALL	S MT 59	405	
Comment Subject (please check one	•)				
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Commenter Information		_				
Name: RON AL	12 D	Scott				
Complete Address:	93 HAS	Tings k	d CA	sinde	Country	MT
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Instructions

Commenter Information					
Name: J. Casselli					
Complete Address: 11 Red Coulee Belt,	MT 59412				
Comment Subject (please check one)					
\square Special Use Permit Application	\square Subdivision	Zoning Tex	t and/or Map	Amendme	ent
☐ Growth Policy	☐ Variance	☐ Floodplain	Regulation A	mendment	t
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Other (describe): proposed zoning cha	anges				
Comment					
Request web site maps be posted to the web in	useable formats current	pdf are large files th	at are not user fr	iendly for viev	wing maps.
Please hold zoning meetings at times that are of				•	
Consider moving the February 19th meeting so	cheduled for 0900 to after	er work or school hou	irs 4:30 or 6 pm	Please consi	der
later time for all additional meetings.					
In addition, the zoning board continues to bring	g up these large scale zo	ning proposals every	few years that a	re extensive	with
limited time for overall review. Past zoning cha	anges have also not appe	eared to be consister	nt with how devel	opment or ch	anges
have occurred. Consider extending comment p	periods and review of this	current zoning prop	osal.		
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National Secretary of the Control of	For Office U	ico Only			
Date Received: 2 – 13 – 19		-13-19	Complete:	⊠ Yes	□ No



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Instructions

Commenter Information	,				
Name: ROBERT AND EARL	YNE LASS	5124	9444.8 MM-410.0021 IDCS-0011M-741 MMCC.		
Name: <u>ROBERT AND EARL</u> Complete Address: <u>149 BICKER</u>	GRO Rd, G	FREATFALLS N	11 599	105	0
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To the Cascade Courty Planning Board—
You may want to make these corrections
in your new "Cascade County Zoning Regulations"
booklet.

13-Table of Contents
Wee # 7.11 instead of 7.1 for Industrial (1) District General
Requirements.
This same error is repeated on p. 108,
where the heading is numbered 7.1 instead

of 7.11.

p.7-section 1-1 Purpose of Regulation Adoption on line 9, standards is mispelled (stradards).
" to establish alequate stradards for the provision of light, air, and open spaces."

Sencirely Nancey Ditchak 2-15-19



Date Received: 2-15-2019

Date Reviewed: 2-15-3019

Complete: 1979



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Date Received:	D	ate Reviewed:	Complete:	Tyes TNo

Cascade County Public Works Department Planning Division

Addressed to: Cascade County Planning Board

Commentor Information

Name: Nancy Dutchak

Address: 3123 Park Garden Lane; Great Falls, MT 59404

Date: February 15, 2019

Commentor Subject

Zoning Text and/or Map Amendment/ esp. regarding the proposed Madison Food Park

Comment:

I have some very grave concerns about the slaughterhouse that is proposed for a site east of Great Falls. I have been doing lots of research on slaughterhouse towns, and nothing that I have read is good. If you google "positive effects of slaughterhouses on communities" you come up with ZERO results, and only negative effects appear. As a matter of fact, most of what I have read is downright ALARMING!!

According to an extensive study done by the University of Iowa in 2005, the evidence suggests that host communities for slaughterhouses do experience some growth in employment, but the job growth tends to be concentrated in low-paying jobs. The negative wage effect of counties with meat-packing and processing swamps the positive employment effect. The result is that meatpacking employment grows at the expense of employment growth in other sectors of the economy. Is this what we want for Great Falls? No decent high-wage paying company will ever want to come to Great Falls once we become known as a slaughterhouse town. Therefore, this would not be an economic boon for Great Falls, but economic devastation.

The bad economic effects of this large slaughterhouse is bad enough, but even worse would be our decreased quality of life due to air, water, and land pollution, terrible odors, increased crime, increased low-income housing, increased truck traffic, over-burdened medical care and social services, and decreased property values. Already people on the east side of town are having problems trying to sell their houses, and I have heard of a number of people who will leave Great Falls if the Madison Food Park is built. Don't we want Great Falls to be someplace that is inviting to visit and pleasant to live in, rather than a place that is scorned and pitied because of the poor quality of life we will have if this project is allowed to go through?

The worst losers of all would be the poor people who work at the slaughterhouse. The people who work at large slaughterhouses have the highest rate of accidents and sickness than any other manufacturing job. That is probably why the turnover rate at these facilities approaches 90% every year. Why would we want to have a business in Great Falls that is so dangerous, unhealthy and unpleasant for the workers, and one that most of us would not want our children to work at? We can do so much better than this!!

I have included several articles with this comment form to back up my statements. One is from www.foodandwaterwatch.org, another is from www.sustainabletable.com, and the third one is an article from the Natural Resources Defense Council.

I have also included portions of the proposed Cascade County Zoning Regulations, and I have highlighted those sections that show the purpose of the Cascade County Planning Board is to promote, improve and protect the public health, safety, comfort, convenience and the general welfare of the people and property owners of Cascade County. I do not believe that this proposed project meets those standards, and I urge you to just say NO to this large-scale slaughterhouse. It would change our community for the worse and we would never recover from all of the bad effects. All slaughterhouses allowed in the county should be limited to employing 100 people or less (TOTAL employees, not per shift, and including office workers, floor workers and administration). Please do your own diligent research on how large slaughterhouses negatively affect communities, and then do the right thing for the people of Great Falls. Remember, you represent all of us and are elected to do what is right for the majority of Cascade County, and not just do what is beneficial to a large company in Canada and perhaps a few local investors.

Simerely, Mancy Dutchak

From the Cascade County Zoning Regulations SECTION 1. PURPOSE 1.1 Purpose of Regulation Adoption

These regulations are adopted for the purpose of promoting, improving and protecting the public health, safety, comfort, convenience and the general welfare of the people and property owners within Cascade County exclusive of incorporated cities and towns. The fulfillment of this purpose is to be accomplished by seeking the following objectives:

To provide for compatible urban growth in the vicinity of cities and towns that at a minimum must include the areas around municipalities:

To ensure proper living and working conditions and to prevent the development of blight and slums;

To establish adequate stndards for the provision of light, air, and open spaces;

To facilitate the provision of adequate transportation, and of other requirements and services such as water, sewerage, schools, open space, and parks;

To zone all properties with a view to conserving the value of buildings and encouraging the most appropriate use of land throughout Cascade County;

To protect residential, business, commercial, and industrial areas alike from harmful encroachment by incompatible uses and to ensure that land allocated to a class of uses shall not be usurped by inappropriate uses;

To avoid the inappropriate development of lands and provide for reduction of flood damage;

To fix reasonable zoning standards to which buildings and structures shall conform;

To prevent such additions to, and alterations or remodeling of, existing buildings or structures as would not comply with the restrictions and limitations imposed herein;

To foster a more rational pattern of relationship between residential, business, and industrial uses for the mutual benefit of all;

To isolate or control the location of unavoidable nuisance producing uses:

To define the powers and duties of the administrative and enforcement officers and bodies; and To prescribe penalties for any violation of the provisions of this ordinance, or of any amendment thereto.

1.2 Interpretation, Conflict with Other Laws

In their interpretation and application, the provisions of these regulations shall be held to be minimum requirements, adopted for the promotion of public health, safety and the general welfare. Whenever the requirements of these regulations are at variance with itself or the requirements of other lawfully adopted rules, regulations, or resolutions, the most restrictive, or that imposing the higher standards shall govern.

PLANNING BOARD

The Cascade County Planning Board, authorized under §76-1-101, MCA, and tasked with an advisory role for ensuring the promotion of public health, safety, morals, convenience, or order for the sake of efficiency and economy in the process of community development.

SPECIAL USE PERMIT

A use that would not be appropriate generally or without restriction throughout the zoning classification district but which, if further controlled as to number, area, location, or relation to the neighborhood, would promote the public health, safety, welfare, order, comfort, convenience, appearance, prosperity, or general welfare. Special use permits may be permitted in a zoning classification district if a specific provision for such special use is explicitly listed in the Zoning District Regulations as a special use and a special use permit is issued by the Cascade County Planning Division upon approval of a Special Use Permit by the Cascade County Zoning Board of Adjustment.

8.18 LANDSCAPING REQUIREMENTS

The Cascade County Commission, in order to provide for a healthy community and environment, a more pleasant living environment, increased property values, and to provide for a lasting social, economic,

environmental, and aesthetic benefit to the county, has enacted the following landscaping requirements for all C, I-1, I-2, MU, and MH and as otherwise required in these regulations. The general purpose of these requirements is to make the county more attractive and aesthetically pleasing, promote and improve public health and safety through the abatement of noise, glare of lights, dust, and air pollution, ensure that land uses of different intensity have sufficient buffering between them to minimize negative effects, promote economic development by providing a high quality of life, enhance ambient environmental conditions by providing shade, air purification, oxygen regeneration, groundwater recharge, storm water runoff retardation, and heat abatement.

8.20 LIGHT INDUSTRIAL (I-1) ZONING DISTRICT STANDARDS

All operations shall:

- (1) store all raw material, finished products, machinery, and equipment, including company owned or operated trucks and motor vehicles, within an entirely closed building or sight-obscuring fence, berm, or other such improvement no less than six (6) feet in height unless waived or modified by the Zoning Administrator. This shall not preclude display areas for sales;
- (2) emit no excessive obnoxious odors:
- (3) exhaust no excessive waste into the air or create excessive dust by the industrial operation;
- (4) discharge no untreated sewage or industrial waste into any streams or on open grounds without approval of said system by the appropriate authority

10.6 STANDARDS APPLICABLE TO ALL SPECIAL USES

Before the Board of Adjustment can approve any Special Use Permit, it must first reach each of the following conclusions:

- (1) Conditions may be required that the ZBOA determines if implemented, will mitigate potential conflicts in order to reach these conclusions.
- (2) The proposed development will not materially endanger the public health or safety. Considerations are the following: a.Traffic conditions in the vicinity, including the effect of additional traffic on streets and street intersections, and sight lines at street intersections and approaches. b.Provision of services and utilities, including sewer, water, electrical, telecommunications, garbage collections, and fire protection .c.Soil erosion, sedimentation, and storm water runoff. D .Protection of public, community, or private water supplies, including possible adverse effects on surface waters or groundwater
- .(3) The proposed development will not substantially injure the value of adjoining property or is a public necessity. Considerations are the following: a.The relationship of the proposed use and the character of development to surrounding uses and development, including possible conflicts between them and how these conflicts will be resolved. b.Whether the proposed development is so necessary to the public health, safety, and general welfare of the community or County as a whole as to justify it regardless of its impact on the value of adjoining property.(4)The proposed development will be in harmony with the area in which it is located. Considerations are the following: a.The relationship of the proposed use and the character of development to surrounding uses and development, including possible conflicts between them and how these conflicts will be resolved.

https://www.foodandwaterwatch.org/problems/factory-farming-food-safety

Factory farms pollute the environment and our drinking water, ravage rural communities, and harm the welfare of animals—while increasing corporate control over our food.

Factory Farming & Food Safety

Factory farming is an unsustainable method of raising food animals that concentrates large numbers of animals into confined spaces. Factory farms are not compatible with a safe and wholesome food supply. It's time to ban factory farms.

How did we get here?

Over the past three decades there has been an economic and geographic shift in how and where food animals are raised in the United States. Large scale factory farms have raising one type of animal have replaced small or medium scale farms that raised dairy and beef cattle, hogs, chickens and turkeys. The rise of factory farming has been driven by three factors: unchecked corporate power, misguided farm policy, and weak environmental and public health regulations.

Factory Farming Increases Corporate Control of our Food

As the number of companies that farmers sell livestock, eggs or milk to has decreased due to mergers and increasing consolidation of the food industry, the number of dairy, hog and beef cattle producers in the United States has also declined sharply over the last 20 years. The meatpacking, milk and egg processing industries have become more controlled by just a handful of big players and the remaining farms raising food animals have grown bigger. In the chicken industry, contract farming is now the norm-- meaning farmers sign up with a corporate integrator that provides the animals and the feed and micromanages the day-to-day operations on the farm--often through the use of unfair one-sided contracts. The real price farmers receive for livestock has trended steadily downward for the last two decades. Most farmers barely break even. Learn more about corporate control in our food system.

Bad Public Policy Facilitates Factory Farming

Misguided farm policy has artificially reduced the cost of feed. Since the passage of the 1996 farm bill, farm policy has encouraged overproduction of crops such as corn and soybeans. This overproduction harms family farms by reducing the value of these crops and forcing farmers to plant additional acreage in order to make a living. While this overproduction is bad for family farmers, it's a boon to the corporate agribusinesses that purchase these crops for use in animal feed and creates an indirect subsidy to the meat industry.

Waste From Factory Farms: An Environmental and Public Health Crisis

For several decades, the U.S. Environmental Protection Agency and state governments have failed to regulate the environmental impacts of factory farms. When factory farms operate virtually unregulated the environment and nearby rural communities pay the price. The vast quantities of manure from factory farms can — and do — make their way into the local environment where they pollute air and water. Several municipal water systems in the midwest where many factory farms are located must regularly implement costly clean up techniques to remove factory farm pollution from the water supply in order to avoid public health disasters. Likewise, pollution from factory farms runs off into streams that feed into our major waterways like the Chesapeake Bay, Great Lakes and Gulf of Mexico—contributing to algal blooms and dead zones that impact water supplies and destroy aquatic ecosystems, recreation and livelihoods.

Small, diversified farms that raise animals alongside other crops have always used manure as fertilizer without polluting water. The difference with factory farms is scale. They produce so much waste in one place that it must be applied to land in quantities that exceed the soil's ability to absorb it as fertilizer.

Factory Farms Threaten Public Health

Factory farms contribute to the rise of antibiotic-resistant bacteria. Every single day, factory farms feed animals routine, low doses of antibiotics to prevent disease in filthy, crowded living conditions. In fact, 80% of the antibiotics used in the U.S. are by agriculture. Overuse of antibiotics creates conditions for bacteria to develop resistance to them, and when these antibiotic-resistant bacteria spread to humans either in our food supply, via animal to human transfer on farms, or through contaminated waste they can cause serious or even deadly antibiotic-resistant infections in people. Over two million Americans suffer from an antibiotic-resistant infection every year, and 23,000 people die. The FDA has known about the misuse of antibiotics since the 1970s, but has not required factory farms to stop this dangerous practice.

Factory Farms Create Food Safety Risks

The stressful, crowded conditions of factory farms make it easy for disease to spread, which can also lead to food safety risks. When thousands of beef cattle are packed into feedlots full of manure, bacteria can get on their hides and then into slaughterhouses where bacteria on even one animal can contaminate thousands of pounds of meat. In 2010, the crowded, unsanitary conditions at two Iowa egg companies caused a recall of more than half a billion potentially Salmonella-tainted eggs.

What's worse is that our government, at the urging of the biggest companies, is trying to essentially deregulate the inspection system for meat and poultry by allowing company inspectors to replace government inspectors, and allowing companies to increase line speeds making it nearly impossible to ensure that all birds and carcasses are closely inspected before heading to processing.

Community and Economy (www.sustainabletable.com, Grace Communications Foundation)

Agribusiness' large-scale and <u>factory farms</u> not only produce foods that can be harmful to our <u>health</u> and <u>local environments</u>, they also negatively affect a community's <u>economy</u>. With claims that its presence will create new jobs, invest in local business, and increase property value, many communities open their arms to these farms. Recent experience, however, has shown that when large-scale farms enter communities, replacing small farms, they can actually create an economic downturn.

Job Access

As recently as 2008, the US agricultural industry consistently experienced record profits, ^E but this agricultural boom did not create more opportunities for the average farmer or rural worker. The percentage of the rural workforce employed on farms dropped by about half throughout the 1980s and 1990s ^E and continues to fall in 2008 to under 2% of the US labor force. ^E Some of these job losses might be offset by increased opportunities in <u>processing</u> plants or related industries, but those new jobs are often located far away, so <u>workers</u> located near farms do not have access to them.

Many factory farms claim that by entering a community there will be an influx of jobs. In fact, most factory farm jobs pay such low wages that the work is a severe pay cut for local residents. Because of this, most must hire, or bring in, immigrant labor from Mexico and South America. E Labor conditions are often so horrible that on-the-job amputations are prevalent and health care is slim to non-existent. This atmosphere persists because immigrants unfamiliar with language, law and labor in the United States, are afraid to speak up or unionize.

Local Business

While many workers have lost jobs as a result of industrial farming, farmers are losing control over the way they farm and the prices they can ask for their products because of contract growing. Today, few poultry growers actually own the chickens they raise, and hog-growers are increasingly raising their herds for outside owners as well. Fithese farmers have no say over what breeds of animals they raise, and are often required to buy feed and other products from the same companies that own their animals. As corporate farms grow bigger and more centrally-controlled, small farms are unable to compete and eventually disappear.

Large, industrial farms moving in, and contract growing on smaller farms, also affect non-farm local businesses. A Michigan study demonstrated that small hog farms proportionately spend almost 50% more at local businesses than large farms do, primarily because larger farms buy feed in bulk from sources outside of the community. Esince factory farms are vertically-integrated, farm materials are bought within the corporation, rather than at the local feed or hardware store. In addition, industrial farms are often too large to be locally supplied, so they must buy feed and other materials in bulk from distant suppliers. For example, Wisconsin dairy farmers — who traditionally grew their own feed on the same land where they kept their cows — have increased herd sizes beyond sustainability and subsequently turned to importing feed because there isn't enough local acreage for both cows and crops.

Property Value & Tax Revenue

Despite the fact that industrial farms invest less in local economies than small farms, there is the claim that they increase property values and tax revenue. Class action lawsuits against factory farms in a number of states debunk this claim ^E and numerous studies have shown that property values are often negatively affected by large-scale livestock production, mostly due to undesirable and highly unpleasant odors coming from their facilities. An Iowa study showed that property values dropped approximately ten percent when large confined animal feeding operations were opened upwind of those properties. ^EOne study of communities in Missouri demonstrated that houses located within one tenth of a mile of an industrial farm lost as much as 88 percent of their value.

Evidence suggests that the effect of industrial agriculture on tax revenue is negative - many industrial farms receive large tax breaks, ^Eabatements ^Eand exemptions, ^Econtributing little to local revenue. Though one Iowa study of hog farms suggested that local and state revenues increase when herd sizes grow toward 300 sows, they then decline as the herd size approaches 3,400. ^EAnother report estimated that cattle feedlots have a large impact on local roads because of the constant transport of cattle in and out of the facility, and the funding required to maintain those roads offset any increased tax revenues that did come from the farm. ^E

Community Health

Factory farms directly affect community health by introducing potentially hazardous substances into the air and water. Air pollutants such as hydrogen sulfide, ammonia, and particulate matter are released in significant quantities by large confined animal feeding operations, and all have the potential to negatively affect surrounding communities. Feople living near hog farms, for example, often have increased respiratory problems, most likely due to the large quantities of ammonia emitted by these types of facilities. Fone recent study indicates that children attending schools located near industrial farms may be at a higher risk for asthma.

Large farms also often pollute local <u>water</u>sources, mainly through the release of nitrates and nitrites from chemical fertilizers. ^EA study of almost 2,000 wells across the country showed that 9 percent of domestic wells and 2 percent of public-supply wells had nitrate concentrations in excess of the EPA's maximum contaminant level. ^ENitrate poisoning can cause dangerously low blood-oxygen levels in babies (or blue-baby syndrome), spontaneous abortions, and possibly cancer. ^EThis is an especially serious problem in rural communities, because rural Americans are heavily reliant on groundwater and domestic wells. ^E

While many physical problems have been linked to factory farm runoff and air pollution, there is evidence that psychological and social problems can also result from living close to such facilities. Estudies suggest that symptoms such as fatigue, depression, and mood disturbances occur in higher proportions near confined animal feeding operations. Eseveral studies also suggest that the presence of industrial farms can cause an increase in disputes between neighbors and the loss of social status, mutual trust, social cohesiveness, and other measures of "social capital." A study of one Oklahoma county from 1990 to 1997—a period in which large-scale hog farming was being introduced—indicated dramatic increases in violent crime, theft, and civil court cases. Counties which did not experience such changes in agricultural practices had decreases in all of those problems during the same period.

"Industrial Farming and Your Health"

The New York Times ran a front-page story in May 2003 about the health problems associated with industrial livestock farms. The following excerpt provides a few examples of the many health problems that industrial agriculture can cause:

"Paul Isbell of Houston, Miss., started experiencing seizures after a hog farm moved in down the road. Jeremiah Burns of Hubbardston, Mich., now carries a six-pound oxygen tank with him. Kevin Pearson of Meservey, Iowa, carried a towel in his car because he vomited five or six times a week on his way to work. Julie Jansen's six children suffered flu-like symptoms and diarrhea when farms moved into their neighborhood in Renville, Minn. One of Ms. Jansen's daughters was found... to have neurological damage. She has problems with balance and has lost some feeling in her fingers." E

Local Environment

Industrial farms also take a toll on the environment in ways that affect the local community even when they don't pose an immediate threat to human health. For example, the particulate matter emitted from such farms contributes greatly to haze. Foul odors—which are always a nuisance, but which may or may not be hazardous—are almost always emitted by large livestock operations. Ammonia emitted from farms can contribute to haze, loss in forest production, and a loss in biodiversity. The nitric oxides produced in large quantities by farms, especially in manure application, are among the leading sources of acid rain.

Phosphorous and nitrogen pollution from fertilizers can cause fish kills, toxic algae blooms, and other significant changes in water systems. EMetals such as copper, zinc, lead, chromium, arsenic and cadmium are often added to animal feed, and when they are excreted through manure they often end up on fields as part of fertilizers. EThey are all toxic to humans. Some of these metals, like copper and cadmium, Ecan be directly absorbed by crops, and most of them can pollute drinking water as they either seep into groundwater or exit the fields along with other harmful pollutants via water runoff.

What You Can Do

- The best way to keep factory farms out of communities is by purchasing foods directly from small farmers. You can use <u>Eat Well Guide</u> to locate sources of sustainable meat and dairy in your area, and visit farmers markets, farm stands, or join a CSA ^G group to keep small farms afloat and factory farms out.
- Another way to build community around food and sustainable farming is by hosting a sustainable community event. Once
 you've found your local farmer, get your friends and neighbors together to celebrate and support local farms!

Did You Know?

- Odor alone even if the individual chemicals that cause it are not hazardous can cause adverse health effects in certain situations.
- Fly infestations and light pollution are two of the many negative effects that industrial livestock facilities have on rural communities. These nuisances are not only damaging to quality of life of neighbors, but can also harm human health.

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These Montanans Don't Want an Industrial Slaughterhouse in Their Backyard

In the small city of Great Falls, residents push back against a Big Ag plant that would consume 3.5 million gallons of water—and produce 102,995 pounds of waste—per day. February 01, 2019 <u>Lora Shinn</u>

Rion Sanders/Great Falls Tribune/USA Today Network



Stacy Hermiller was worried about her family's health and her property value when she found out a meat-slaughtering facility was being planned near her home east of Great Falls.

Stacy Hermiller has deep roots in Big Sky Country. A fifth-generation Montana resident whose family has lived there since 1901, she fits the state's outdoorsy profile, actively enjoying fly-fishing, hiking, backpacking, and all manner of wilderness pursuits.

In 2008, when Hermiller bought a 20-acre piece of property about eight miles southeast of Great Falls, she had a picture-perfect idea of the rustic life she'd build there. That was before she received the certified letter in the mail.

The letter described a proposed slaughterhouse in the works for the property next door. Hermiller's neighbor across the highway didn't receive such a letter; the county only notified those whose property shared a fence line with the project.

Curious, Hermiller looked up the plant's plans, detailed on the county's website. There, she discovered that the Canadian company Friesen Foods wanted to construct Madison Food Park—which would become the largest meat-processing plant in Montana—in her community, known mostly for its small-scale agricultural businesses and Air Force

base and as a gateway to several state and national parks. Friesen would transform 3,000 acres (a tract about six times the size of Disneyland) into a "multi-species food-processing plant for cattle, pigs, and chickens and the further processing facilities for beef, pork, and poultry."

Not only would the sheer size of the facility overwhelm Great Falls, a city of almost 60,000 residents, but it would also contribute a vast amount of pollution. For starters, it would produce more than 300 acres of treated industrial waste, to be disposed of in domestic waste lagoons. Across 260 days a year, its operators would process thousands of animals 24 hours a day in three eight-hour shifts, according to the project's application. Every day, dozens of trucks would transport animals to the facility and carry meat away, along the two-lane U.S. Highway 89. The parking lot would accommodate 1,900 vehicles.

"I was horrified. It was literally in my backyard," Hermiller says. The region was zoned for agriculture and didn't offer an adequate parcel of industrially zoned land. So the county planning board had voted to change allowable uses for the land under a special-use permit law. Hermiller notes that Cascade County advised its commissioners to vote the changes through—and that they ended up approving them unanimously. "The meeting was public, but it was not well advertised, so no members of the public were present to debate or offer comment," she says. As a result, when they first saw the plans, Hermiller and her neighbor were "dumbfounded and helpless. We just couldn't believe what we were looking at."

A physician's assistant at an orthopedic surgeon's office, Hermiller hadn't been active in local politics. But spurred by concerns about how an industrial slaughterhouse could impact the local environment and quality of life in Great Falls, she banded together with neighbors to learn more about the proposed food company and get organized, forming <u>Great Falls Area Concerned Citizens</u>.

"Citizens are right to be wary," says NRDC's <u>Valerie Baron</u>, an attorney focusing on sustainable agriculture and antibiotics as well as health and food. Though Friesen touted the promise of new local jobs, she notes, "Many slaughterhouse jobs are among the most dangerous. The risk of workplace injury is high, but there is also a significant risk from pathogens." Studies show that workers in slaughterhouses and factory farms are <u>at risk from potentially deadly antibiotic-resistant bacteria</u>, and Baron points out that workers can bring these bacteria home. Moreover, slaughterhouses can invite other environmental hazards, including an influx of heavy truck traffic, and can encourage other dangerous mega food-production facilities to move in.

Community meetings started with 60 or so residents in the fall of 2017. By the following spring, the Great Falls Area Concerned Citizens' presentations, with guest speakers from the Socially Responsible Agriculture Project and elsewhere, were attracting up to 450 attendees, according to Hermiller.

Waters at Risk

Residents are drawn to Great Falls for the area's natural beauty. What's more, homes are cheap and the air quality is good. The city even made a <u>Forbes</u> "25 <u>Best Places to Retire</u>" list, in 2015.

Water in this part of north-central Montana is a defining feature. Residents can hike a trail that winds for 58 miles along the state's longest river, the Missouri, which flows past Great Falls. Nearby are five waterfalls and one of the largest freshwater springs in the United States. Giant Springs (first recorded by Lewis and Clark in 1805) produces 156 million gallons of water per day, originating in an opening in the Madison aquifer in the nearby Little Belt Mountains. A wetland-rich wildlife refuge sits just north of Great Falls, and the Roe River, often called the "shortest river in the world," flows between Giant Springs and the Missouri.

"The Missouri River is the heart of the Great Falls community and the surrounding area," says Zack Strong, an NRDC attorney and wildlife advocate who grew up there. "We used to fish, swim, wade, paddle, and splash around with the dogs in the river throughout the year. Building the proposed slaughterhouse would put the Missouri at risk and jeopardize the local economy, wildlife, recreation, and residents' quality of life. Allowing the river to become polluted would be devastating."

Madison Food Park—so named for the aquifer it would pull from—would also rely heavily on the region's water, consuming a total of 3.5 million gallons of water per day via three or four deep-water wells. Great Falls residents know

this alone would spark conflict: Throughout Montana, agriculture interests and residents engage in "water wars" as they battle over access, notes Guy Alsentzer, executive director of the nonprofit Upper Missouri Waterkeeper. "There's a saying in Montana: 'Whiskey's for drinking, and water's for fighting,' "he says. Agriculture is also the single-largest source of nutrient and sediment pollution entering the waters of southwest and west-central Montana, according to the group.

In the original proposal, Friesen Foods estimated that 102,995 pounds of animal waste would be generated by the operation per day. It also anticipated that "99.6% of the solid and liquid waste produced" would be either recycled using anaerobic digestion technology; repurposed into agricultural commodities; or rendered into pet food, fertilizer, or other protein meal. The company, coincidentally, had previously focused on producing animal feed.

Alsentzer notes that despite the promises, the proposal was disturbingly lacking in specifics about how any of that recycling, repurposing, or rendering would be accomplished. "The entire facility's waste management is going to be a big threat to groundwater," he says. The proposed site is at the headwaters of Antelope Creek, and the nearby Sand Coulee Creek flows into the Missouri River.

In Montana, surface waters (including runoff or spills) are connected to the groundwater through a porous soil, and as anywhere, the groundwater interacts closely with local waterways. "You put any pollution into local groundwater and it probably affects nearby streams and rivers," says Alsentzer.

Most large-scale agricultural facilities take lagoon waste—a "nasty soup of strained blood and guts," as Alsentzer describes it—and spray it onto the property's soil and grass as fertilizer (and simply as a way to get rid of it). "It can have minimal impact for small-scale slaughterhouses," Alsentzer says, but not at the industrial level. "Whether the waste is stored as solids or liquids in open lagoons, the scope of likely water pollution is boggling."

The waste can contain some pretty bad stuff: for starters, nitrogen and phosphorus, which, should they leach into waterways, disrupt the food chain by creating oxygen-sucking algae blooms that kill off aquatic populations. There's also *E. coli*, antibiotics, and antivirals. "There's an overall cumulative threat," Alsentzer says, especially given that the Missouri River is less than 10 miles, as the crow flies, from the proposed slaughterhouse. "If there's a percolation into the groundwater from the lagoons, how will they even monitor for it, over dozens and dozens of acres?"

The record speaks for itself. Three-quarters of large U.S. meat-processing plants that discharge wastewater directly into streams and rivers violated their pollution-control permits in the past two years by discharging bacteria, pathogens, nutrients, and other materials, according to a report from the Environmental Integrity Project (EIP), based on U.S. Environmental Protection Agency records.

Wait and Watch

In May 2018, without any official statement regarding its reasoning, Madison Food Park announced it would amend its application and requested more time to make the changes. "The widespread, vocal, consistent public opposition certainly played some role," Alsentzer says.

There's no deadline, so a new application could be submitted at any time. And Hermiller, who sold her property not long ago, suspects that Friesen will regroup and come back "bigger, stronger, and more effective." But she doesn't expect the community to back down from its fight against the Big Ag plant. "We don't want to be complacent."

"We have more cows than people in Montana," Hermiller observes wryly. "I'm not against the slaughterhouse industry; I want responsible beef slaughterhouses. This is not responsible ranching, and it's not what Montana was built on. We're the 'last best place on earth,' " she adds, stating Montana's unofficial motto. "Let's keep it that way."